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7 Attorneys for Defendant  
JASON EDWARD THOMAS CARDIFF

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9 UNITED STATES DISTRICT COURT  
10 CENTRAL DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 JASON EDWARD THOMAS  
CARDIFF,

15 Defendant.  
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Case No. 5:23-CR-00021-JGB

**UNOPPOSED *EX PARTE*  
APPLICATION FOR LEAVE TO  
FILE REPLY IN SUPPORT OF  
MOTION TO DISMISS  
INDICTMENT WITH PREJUDICE,  
SUPPLEMENTAL DECLARATION  
OF STEPHEN G. LARSON, AND  
EXHIBIT A TO THE  
SUPPLEMENTAL DECLARATION  
OF STEPHEN G. LARSON *UNDER  
SEAL*; DECLARATION OF  
STEPHEN G. LARSON**

*[Filed concurrently with [Proposed]  
Order]*

**EX PARTE APPLICATION FOR LEAVE TO FILE UNDER SEAL**

**I. CONTACT INFORMATION FOR OPPOSING COUNSEL PURSUANT TO C.D. CAL LOCAL RULE 7-19**

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Manu J. Sebastian  
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**II. APPLICATION**

The Defense hereby applies for an order authorizing the filing of an unredacted version of his Reply in support of Cardiff's Motion to Dismiss Indictment with Prejudice, the Supplemental Declaration of Stephen G. Larson in support of Cardiff's Motion to Dismiss Indictment with Prejudice, and Exhibit A to the Supplemental Declaration of Stephen G. Larson in support of Cardiff's Motion to Dismiss Indictment with Prejudice *under seal*.

The Parties in this matter stipulated to a protective order. (ECF No. 37.) Section 5(k) of the protective order provides "[i]n the event that a party needs to file Confidential Information with the Court or divulge the contents of Confidential Information in court filings, the filing should be made under seal." The Reply in support of Cardiff's Motion to Dismiss Indictment with Prejudice, the Supplemental Declaration of Stephen G. Larson in support of Cardiff's Motion to Dismiss Indictment with Prejudice, and Exhibit A to the Supplemental Declaration of

1 Stephen G. Larson in support of Cardiff's Motion to Dismiss Indictment with  
2 Prejudice contain information that has been identified as Confidential Information  
3 by the Government. Accordingly, in order to abide by the stipulated terms of the  
4 protective order in this matter, the Defense requests this sealing order.

5 On May 6, 2024, the Government advised by email that it does not oppose  
6 this request.

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8 Dated: May 6, 2024

LARSON LLP

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10 By: /s/ Stephen G. Larson

11 Stephen G. Larson

12 Hilary Potashner

13 Jonathan Gershon

14 Attorneys for Defendant

15 JASON EDWARD THOMAS CARDIFF  
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**DECLARATION OF STEPHEN G. LARSON**

I, Stephen G. Larson, hereby declare and state as follows:

1. I am a partner at Larson LLP, attorneys of record for Defendant Jason Cardiff. I have personal knowledge of the facts set forth herein, and if called as a witness, I could and would competently testify to the matters stated herein.

2. Pursuant to L.R. 7-19, I submit this declaration in support of Jason Cardiff's *Ex Parte* Application for Leave to File Cardiff's Reply in Support of Cardiff's Motion to Dismiss Indictment with Prejudice, Supplemental Declaration of Stephen G. Larson in support of Cardiff's Motion to Dismiss Indictment with Prejudice, and Exhibit A to the Supplemental Declaration of Stephen G. Larson in support of Cardiff's Motion to Dismiss Indictment with Prejudice *under seal*.

3. On May 6, 2024, the government sent an email to defense counsel informing that it does not oppose this sealing request.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

Executed on this 6th day of May, 2024, at Los Angeles, California.

/s/ Stephen G. Larson  
Stephen G. Larson